UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

R. ALEXANDER ACOSTA, Secretary of Labor United States Department of Labor

Plaintiff,

Case No.: 5:17-cv-00561 (BKS-ATB)

v.

LIBERTY GAS STATION AND CONVENIENCE STORE, LLC, LIBERTY PIZZA & CONVENIENCE, INC., and HUSEYIN TURAN, Individually,

Defendants.

DECLARATION OF ANAS SALEH, ESQ.

- I, ANAS SALEH, declare under penalty of perjury that the following is true and correct:
- 1. I am an attorney with the law firm of Anas Saleh, Esq., located at 404 Oak St., STE 288, Syracuse, New York 13203. I submit this Declaration in Support of Defendants' Liberty Gas Station and Convenience Store, LLC and Huseyin Turan, Individually (together "Defendants") Memorandum of Law in Support of Defendants' Opposition to Plaintiff's Motion for Spoliation Sanctions.
 - 2. I am the attorney assigned to represent Defendants in the above-captioned matter.
- 3. I have reviewed the Plaintiff's motion papers (including exhibits) with respect to its motion for spoliation sanctions.
- 4. I submit the annexed Memorandum of Law in Support of Defendants' Opposition to Plaintiff's Motion for Spoliation Sanctions.

- Any exhibits submitted with Defendants' response are true and accurate copies of 5. the same to the best of my knowledge.
- Pursuant to 28 U.S.C. Section 1746, I declare under the penalty of perjury the 6. foregoing is true and correct.

Executed on the 11th day of January 2019.

Respectfully submitted,

Anas Saleh, Esq. (Bar No. 517409)

Attorney for Defendants Liberty Gas Station and Convenience Store, LLC and Huseyin

Turan, Individually and as Owner

Anas Saleh, Esq.

Office and Post Office Address

404 Oak St., STE 288

Syracuse, NY 13203

Telephone: (315) 569-1343 Facsimile: (315) 282-2601 Email: asaleh@salehesq.com